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**Comments on the California Energy Commission's
Draft 2005 Integrated Energy Policy Report:
Policy on Imported Electricity Supplies**

The Pacific Energy Policy Center was created as a non-profit Pro Bono organization in 2004, primarily to allow retired utility energy program managers, regulatory staff and legislators to provide input on important energy policy issues facing California.

It is our understanding that the California Energy Commission staff has recommended that the Commission adopt a policy calling for any new electricity being imported to this state for use by California utilities or other energy providers to be generated in powerplants that meet this state's existing air emission standards, and in any case do not violate the existing emission standards required by California for combined cycle natural gas generation powerplants located in this state.

Pacific Energy Policy Center strongly supports such a policy. California should not exports its air pollution by allowing utilities and energy providers to buy power from existing or proposed powerplants, located in other states, that do not meet California's existing air emission standards. Doing so would be a clear violation of the California Governor's climate change policy, and would mean that the health of children and elderly residents of other states would be sacrificed, just so that Californian's could get access to slightly cheaper power.

While "clean" coal power is an emerging concept, there is currently not evidence that coal power can be generated in a manner that does not significantly threaten the air quality and health of citizens living in the air shed downwind of the powerplant producing that power. While we are aware of some very initial research being conducted on underground carbon sequestration and clean coal generation, we are not willing to see Californians subsidizing the construction of dirty coal plants in adjoining states, knowing that this kind of technology is only theoretical at this point.

Until it has been clearly demonstrated that clean coal powerplants can be built in a manner that allows them to fully comply with current California air quality and emission standards, California should not plan on importing electricity from out of state coal powerplants. California regulators should order investor owned utilities and California energy providers not to commit to funding or purchasing power from out of state coal plants for the foreseeable future.

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